



A04-0054 10/08/2001

National Environmental Achievement Track

Application Form

Hitachi Automotive Products

Name of facility

Hitachi Limited

Name of parent company (if any)

955 Warwick Rd

Street address

Street address (continued)

Harrodsburg/KY/40330

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Dwayne Bernitt

Title Section Manager; Health, Safety & Environmental

Phone (859) 734-8934

Fax (859) 734-8070

E-mail dwayne.bernitt@hap.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

We manufacture automotive component parts consisting of air flow meters, alternators, distributors, electronic control units, idle speed control valves, ignition coils, ignitors, throttle bodies and throttle chambers.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3714 3694

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50
☐ 50-99
☐ 100-499
☒ 500-1,000
☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

KYD 981003494

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Completed checklist attached.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

We applied for our Title V permit in December 1998 and we are awaiting approval.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
|---|--|--------|------------------------------|--------|
| | Quantity | Units | Quantity | Units |
| Recycled/Reused Materials Use | 1,747,386 (1999) | pounds | 870,658 (2001) yr to date | pounds |
| <p>i. How is the current level an improvement over the previous level?</p> <p>The amounts listed above are the totals diverted from the landfill. We've continued to train and educate everyone on participating in our program.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We determined some of the materials that were going to the landfill were marketable recyclable materials. We trained and educated employees on our recycling program. We sell those items that are marketable and we consider what those materials are and, if possible, reduce those amounts. For example, instead of using cardboard packaging, we've changed some materials over to returnable totes. Additionally, we have changed many of our pallets from wood to plastic which greatly extends the life of the pallet.</p> | | | | |

Second aspect you've selected

| | | | | |
|---|--|---------------|----------------------------|---------------|
| What aspect have you selected? | What was the previous level (2 years ago)? | | What is the current level? | |
| Emissions of VOCs | Quantity 8.14 (1998) | Units tons | Quantity 6.84 (2000) | Units tons |
| <p>i. How is the current level an improvement over the previous level?</p> <p>It's a reduction in the amount of VOCs released into the atmosphere.</p> | | | | |
| <p>ii. How did you achieve this improvement?</p> <p>We switched coolant materials used in our Machining Center production processes. The material was changed from an oil based product to a semi-synthetic material.</p> | | | | |

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect?
- Total Energy Use
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value 31,219,872 kwh
(calendar year 2000)
(Quantity/Units)
- ☐ Option B:
In terms of
units of production
or output (Quantity/Units)

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value 10% reduction of kwh
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

We're coordinating with energy consultants to develop total facility solutions which conserve resources and improve performance. Some of the potential improvements are changing our lighting to utilize more energy efficient fixtures/bulbs and installation of valves and sensors that provide better use of vacuum pumps and air compressors so they cycle on and off only when needed.

Second aspect you've selected

a. What is the aspect?

Noise Reduction

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 88 - 94 dBA
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value 10% reduction in dBA
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

We're coordinating with facility contractors in an attempt to reduce the noise levels from our vacuum pumps which support our air flow meter production line. Possible improvements may include wrapping the exhaust ducts with sound absorbing materials, redirection of the exhaust ports from the roof towards the ground, adding sound deadening curtains around key areas and running all exhaust into a central muffler device.

Third aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

Packaging Materials Used in Product.

☒ Yes ☐ No

☒ Option A:
Absolute value 616,230 lbs. of pallets disposed
(Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

☒ Option A:
Absolute value 20% reduction in pallet waste
(Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

We're in the process of replacing wooden pallets with reusable plastic pallets. This will reduce the number of wooden pallets that get damaged and sent to the landfill.

Fourth aspect you've selected

a. What is the aspect?

b. Is this aspect identified as significant in your EMS?

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

e. How will you achieve this improvement?

Waste to Air, Water, Land from Disposal or Recovery of Product.

☐ Yes ☒ No

☒ Option A:
Absolute value 58,118 lbs.
(Jan-Jun 2001)
(Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

☒ Option A:
Absolute value 100%
(Quantity/Units)

☐ Option B:
In terms of units of production or output (Quantity/Units)

We utilize a hazardous/regulated waste company to transport our hazardous and non-hazardous materials for use in fuels blending and incineration. We do this to avoid any potential future environmental liability and to divert the material from the landfill. We are aware this is above and beyond what is currently required, however, our goal is to use this process for 100% of applicable materials.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

We use an internal form to identify and track our responses. Environmental issues are addressed by the Section Manager for Health, Safety & Environmental.

2 How do you inform community members of important matters that affect them?

Situations have not yet occurred that have required us to inform community members. If the situation came up, we would probably have the information sent to the local newspaper.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☐ Website [www.](#)

☒ Newspaper

☐ Open Houses

☒ Other

Currently, we would sent the information to the local newspaper. In the future, we will probably have it available on our website.

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

| | Organization | Name | Phone number |
|---|--|-------------------|----------------|
| <i>Representative of a Community/ Citizen Group</i> | Local Emergency Planning Commission Harrodsurg, KY 40330 | Mr. David Weber | (859) 734-6333 |
| <i>State/Local Regulator</i> | Division of Waste Management Frankfort, KY 40601 | Mr. Doug Sample | (502) 564-3358 |
| <i>Other community/local reference</i> | Mercer Co. Recycling Center Harrodsburg, KY 40330 | Mr. Norm Jennings | (859) 734-4754 |

Section E

Application and Participation Statement.

On behalf of Hitachi Automotive Products
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title Yasuhiko Abe/General Manager

Facility Name Hitachi Automotive Products

Facility Street Address 955 Warwick Road
Harrodsburg, KY 40330

Facility ID Numbers KYD 981003494

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☒ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions and Restrictions
- ☐ 4. Control of Incinerators
- ☐ 5. Process Industry Emission Standards
- ☐ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☐ 8. Sampling, Testing and Reporting
- ☐ 9. Visible Emissions Standards
- ☐ 10. Control of Fugitive Dust
- ☐ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☐ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - ☐ - General facility standards
 - ☐ - Preparedness and prevention
 - ☐ - Contingency plan and emergency procedures

- ☐ - Manifest system, Record keeping and reporting
- ☐ - Groundwater protection
- ☐ - Financial requirements
- ☐ - Use and management of containers
- ☐ - Tanks
- ☐ - Waste piles
- ☐ - Land treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)
- ☐ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Hazardous Materials Management

Check All That Apply

- ☒ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

- ☐ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☐ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☐ 3. Installation of Systems of Refuse Disposal
- ☐ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)

- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☐ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☐ 10. Water Quality Standards
- ☐ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☐ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☐ 14. Collection, Handling, and Processing of Sewage Sludge
- ☐ 15. Oil Discharge Containment, Control and Cleanup
- ☒ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☐ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Drinking Water Regulations

Check All That Apply

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☐ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☐ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☐ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☐ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☒ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☒ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)

- ☒ 4. Chemical Information Rules (40 CFR 712)
- ☒ 5. Health and Safety Data Reporting (40 CFR 716)
- ☒ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☐ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)
- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☐ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☐ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☐ 3. Certification of Pesticide Applications (40 CFR 171)
- ☐ 4. Pesticide Licensing Requirements
- ☐ 5. Labeling of Pesticides
- ☐ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☐ 7. Disposal of Pesticide Containers
- ☐ 8. Restricted Use and Prohibited Pesticides
- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

- ☐ 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)
- ☐ 2. RCRA Corrective Action
- ☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name facility name
Facility Location: facility location
Facility ID Number(s): facility ID numbers